

April 23, 2002

**Via Federal Express and Electronic Mail**

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Verizon's Collocation Security Proposal, D.T.E. 02-8

Dear Ms. Cottrell:

Enclosed for filing with the Department are an original and four copies Sprint's First Set of Document and Information Requests to Verizon Massachusetts, Sprint-VZ-1-1 to 1-28, together with a Certificate of Service in the above-referenced proceeding. Please return a filed-stamped copy of this letter to me in the enclosed envelope. Thank you.

Sincerely,

Craig D. Dingwall

Enc.

cc: Joan Foster Evans, Hearing Officer (w/2 enc.)  
D.T.E. 02-8 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications and Energy on its	)	
own Motion pursuant to G.L. c. 159, §§ 12 and 16, into the collocation	)	D.T.E. 02-8
security policies of Verizon New England Inc d/b/a Verizon Massachusetts	)	

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**SPRINT’S FIRST SET OF DOCUMENT AND INFORMATION REQUESTS  
TO VERIZON MASSACHUSETTS**

**INSTRUCTIONS**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts (“Verizon MA” or “Company”) or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response that does not provide the Sprint with the responsive documents, and requests the Sprint to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation that supports the response provided.
15. All page and line references are to the Panel Testimony of Verizon Massachusetts dated April 5, 2002 and filed in D.T.E. 02-8.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated February 27, 2002.

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications and Energy on its own Motion pursuant to G.L. c. 159, §§ 12 and 16, into the collocation security policies of Verizon New England Inc d/b/a Verizon Massachusetts )  
D.T.E. 02-8

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**SPRINT COMMUNICATIONS COMPANY L.P.'S  
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS  
TO VERIZON MASSACHUSETTS**

- SPRINT-VZ-1-1      Please provide a copy of Verizon's responses to all discovery requests, including but not limited to interrogatories and data requests, served upon Verizon in this proceeding.
- SPRINT-VZ-1-2      Page 2, Lines 5-8: Please provide all studies, workpapers, data, statistics, analyses, and other documents that support the statement that there is increased potential for network harm resulting from the presence of physical collocation.
- SPRINT-VZ-1-3      Page 2, Line 6: Please explain and document "Verizon's experience," including a list and description of all security breaches, damage, vandalism, and terrorist acts at Verizon central offices and/or collocation sites. For each alleged breach, damage, vandalism, theft and terrorist act, please describe the date it occurred, the location, any responsive or corrective action taken by Verizon or other companies or governmental or law enforcement agencies, the actual harm incurred in terms by dollar amount, and provide a copy of any police reports or insurance claims.
- SPRINT-VZ-1-4      Page 4, Line 3: Please quantify the "potential for network harm," describe how it was determined and assessed, quantify the potential for network harm, and provide all supporting workpapers, analyses, studies and documentation.
- SPRINT-VZ-1-5      Page 5, lines 14-18; Page 6, Lines 1-3: Please explain why these proposed security measures and enhancements are necessary because of the present network architecture and configuration of equipment and facilities in Verizon's central offices ("COs") and remote terminals ("RTs"), and why they will better protect the telecommunications network, maximize safety,

reduce risk to Verizon's facilities and enable Verizon to provide reliable service. Please provide all supporting studies, analyses, statistics, workpapers and other documents.

- SPRINT-VZ-1-6      Page 18, Lines 1-3: Please provide all documents, analyses, statistics, workpapers and other documents that support the statement that Verizon does not consider its current collocation security measures to provide adequate protection.
- SPRINT-VZ-1-7      Page 18, Lines 10-11: Please provide all documents, analyses, statistics, workpapers and other documents that support the statement that the current tracking measures will not prevent some individuals from causing either intentional or unintentional damage to Verizon's network.
- SPRINT-VZ-1-8      Page 19, Lines 13-17: Must CLECs coordinate with Verizon to access common areas at Verizon COs located in Massachusetts?
- SPRINT-VZ-1-9      Page 21, Line 20: Please list and describe all security violations at Verizon's COs in Massachusetts. For each alleged security violation, please provide the specific location and date of the violation, describe any corrective and/or responsive action taken, and provide a copy of the insurance claim and police report.
- SPRINT-VZ-1-10      Please list and describe all security violations at Verizon's COs in Massachusetts or elsewhere done by Verizon certified vendors.
- SPRINT-VZ-1-11      How many certified contractors have lost certification for accidental violations at Verizon COs in Massachusetts?
- SPRINT-VZ-1-12      Please list and describe all security violations, damage, and/or theft to CLEC property collocated at Verizon COs in Massachusetts, and Verizon's corrective or responsive actions for each reported violation, damage or theft.
- SPRINT-VZ-1-13      Page 22: For each alleged security violation, please provide the specific location and date of the violation, the perpetrator (CLEC, vendor, etc.), describe any corrective and/or responsive action taken, and provide a copy of the insurance claim and police report.
- SPRINT-VZ-1-14      Page 23, Lines 1-3: Please provide all documentation, statistics, workpapers, and analyses that support the statement that numerous different collocators, employees and agents increases the probability of accidents, mistakes, wrongdoing and exposure to financial harm and damage to Verizon's network.

SPRINT-VZ-1-15	How does Verizon plan to provide security for CLECs? Please list all proposed security measures that will protect CLECs' property and interests?
SPRINT-VZ-1-16	How many Verizon COs are exempt from physical collocation in Massachusetts? Please identify each CO that is exempt from physical collocation.
SPRINT-VZ-1-17	How many CLECs are waiting for space in Massachusetts at COs where Verizon has reserved space for itself? Please identify each CO location when responding to this question.
SPRINT-VZ-1-18	How many CLECs are waiting for space in Massachusetts at COs that would become virtual collocation only sites under Verizon's proposal? Please identify each CO location when responding to this question.
SPRINT-VZ-1-19	Please provide the average CLEC waiting time for collocation space at each Verizon CO in Massachusetts.
SPRINT-VZ-1-20	Page 24, Line 6: Please define "reasonable access" as used in this sentence.
SPRINT-VZ-1-21	Page 24, Line 7: Please define "feasible" as used in this sentence.
SPRINT-VZ-1-22	Page 37, Lines 3-4: Please provide all documents, analyses, statistics, and studies that support the statement that it would be practically impossible to segregate Verizon's equipment into separate space in an RT.
SPRINT-VZ-1-23	Page 39, Lines 16-17: Please list the "critical" COs in Massachusetts where Verizon proposes that virtual collocation only should be required. If Verizon has not yet determined which COs are "critical", please provide a Verizon's estimate of which COs are "critical".
SPRINT-VZ-1-24	Page 20: Has Verizon done any studies regarding thumb print scanner costs? If so, please provide the study and study results.
SPRINT-VZ-1-25	Page 20, footnote 18: How many Verizon employees have been fired for violations of propping a door open at a Verizon CO when they are bringing in equipment?
SPRINT-VZ-1-26	Page 20, footnote 18: How many certified vendor violations and/or vendor de-certifications have there been for violations of propping a door open at a Verizon CO when that are bringing in equipment?
SPRINT-VZ-1-27	Must CLECs use Verizon-certified vendors? Are these Verizon-certified vendors the same contractors that Verizon uses?

SPRINT-VZ-1-28      Please provide all costs, including cost studies, for Verizon's recommended security plan. If Verizon has not determined these costs, please provide a good-faith estimate of Verizon's anticipated costs for each security measure.



